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**From:** Beeler, Cindy [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=9B11E688258C462BAB293A6DF8FF4B27-BEELER, CYNTHIA]  
**Sent:** 9/17/2018 5:49:46 PM  
**To:** Squier, Bill [squier.bill@epa.gov]; Wilwerding, Joseph [Wilwerding.Joseph@epa.gov]  
**Subject:** RE: Uinta report  
**Attachments:** WellpadSchematic.pdf

I added my two cents worth below ..

**Cindy Beeler**

US EPA Region 8  
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**From:** Squier, Bill  
**Sent:** Monday, September 17, 2018 9:08 AM  
**To:** Wilwerding, Joseph <Wilwerding.Joseph@epa.gov>; Beeler, Cindy <Beeler.Cindy@epa.gov>  
**Subject:** Uinta report

Hi Cindy & Joe,

We're using a new template for our GMAP reports. I thought y'all would be much better than I at providing info for the following sections. If they are not applicable, that's ok. Do you mind taking a stab?

In theory the internal draft report is due on 9/20, but it doesn't look like the data or lab analysis will be done by then. I'll be in touch on Thursday.

Thanks,  
Bill

## PROJECT OBJECTIVE

- **SCOPE/FOCUS:** Describe who requested the project, what the focus was, and the reason for it if known (e.g. part of a national initiative, etc.)

Region 8 Office of Enforcement, Compliance & Environmental Justice requested NEIC GMAP support for three prolific oil & gas production areas: Denver-Julesburg Basin, CO; Bakken, ND; and the Uinta Basin, UT. This is a component of Region 8's larger efforts supporting the National Enforcement Initiative (now National Compliance Initiative) for Energy Extraction. An objective for all three basins was to more quickly scan large geographic areas with hundreds of wellpad facilities for further follow-up with an OGI operator to ascertain the emission source and its regulatory applicability.

In this Uinta Basin project we had an additional objective to ground-truth the Uinta Basin emission inventory which accounts for VOC emissions by-facility. Uinta Basin was recently designated in nonattainment for ozone and the emission inventory is key to the photochemical ozone modeling used to demonstrate how the area will return to compliance with the NAAQS.

FACILITY OVERVIEW

Not a repeat of project objective.

Relevant or recent history (e.g., recent enforcement actions), information on facility sector and regulatory requirements that apply.

Region 8 has been pursuing wellpad facility inspections to ascertain compliance with federal NSPS subpart OOOO/OOOOa and State federally-enforceable rules. Region 8 has found widespread occurrence of tank emissions not making it from the tank to the intended control device with emissions venting through pressure relief devices during routine operations. Following tank enforcement work in the D-J Basin and the Bakken, Region 8 is now focusing on the Uinta Basin. The Uinta Basin is ~6800 square miles with ~11,000 wellpads scattered along miles of winding dirt roads on State lands and the Uintah & Ouray Indian Reservation and so offers unique circumstances and considerations. Since the area is Indian country and in nonattainment, EPA has direct implementation authority and responsibility in air quality management. Studies in the Uinta Basin have shown a discrepancy between top-down aerial measurements and component-level emission inventories. The combination of GMAP with OGI observations allows Region 8 to begin identifying unaccounted emissions and measure those.

EXAMPLE: According to the EPA Envirofacts database, this facility has been categorized into the following North American Industry Classification System (NAICS) codes:

Table 1. FACILITY CONTACT INFORMATION	
NAICS Code	Description
325412	Pharmaceutical preparation manufacturing
325199	All other basic organic chemical manufacturing
325998	All other miscellaneous chemical product and preparation manufacturing
325192	Cyclic crude and intermediate manufacturing
325412	Pharmaceutical preparation manufacturing
325192	Cyclic crude and intermediate manufacturing
325411	Medicinal and botanical manufacturing
325132	Synthetic organic dye and pigment manufacturing

FACILITY OPERATIONS SUMMARY

Add process narrative or reference appendix with detailed process description. You can summarize all the operations/processes onsite here, and then provide detail on the areas that NEIC inspecting as an appendix if not all were process areas were observed/discussed during the NEIC investigation. Or all descriptions can be included.

Bill – See the attached wellpad schematic – this is an EOG Resources wellpad (whose wellpad facilities were in our GMAP coverage). Not all wellpad facilities have the glycol reboiler between the separator and the gas pipeline, nor did all

wellpad facilities we surveyed include a Combustor for the tank emissions. Otherwise, the schematic provides the process and equipment typical to oil & gas production wellpad facilities.

NOTE: Operations may include wastewater treatment, storm water management, and waste handling in addition to the chemical/manufacturing processes. Therefore, this section can include any operation performed on-site or focus on the specific operations that NEIC inspects.